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IN THE MATTER OF THE APPLICATION OF
SALT RIVER PROJECT, OR THEIR ASSIGNEE (S),
IN CONFORMANCE WITH THE REQUIREMENTS
THE ARIZONA REVISED STATUTES 40-360.03 AND
40-360.06 FOR A CERTIFICATE OF ENVIRONMENTAL
COMPATIBILITY AUTHORIZING THE CONSTRUCTION
OF NATURAL GAS-FIRED, COMBINED CYCLE
GENERATING FACILITIES AND ASSOCIATED
INTRAPLANT TRANSMISSION LINES, SWITCHYARD
IN GILBERT, ARIZONA LOCATED NEAR AND WEST OF
THE INTERSECTION OF VAL VISTA
DRIVE AND WARNER ROAD

**RESPONSE TO SRP'S
DATA REQUEST
TO INTERVENOR
CATHY LOPEZ
AND DATA REQUEST
TO APPLICANT SRP**

2000 SEP -5 P 1:33
AZ CORP COMMISSION
DOCUMENT CONTROL

**CASE NO. 105
DOCKET NUMBER
L00000B-00-0105**

Arizona Corporation Commission
DOCKETED

SEP 05 2000



Intervenor Cathy Lopez responds to SRP's Data Requests dated September 1, 2000
(attached as exhibit A and incorporated herein by reference) as follows:

Response 1. – As previously stated, I am a member of the San Tan Community Working Group and a resident of Gilbert, Arizona.

Response 2. – See response to number 1.

Response 3. – SRP and their consultant EPG would maintain a list of members of the San Tan Community Working Group.

Response 4. – My testimony before the line siting committee will be based upon my participation within the San Tan Community Working Group, conversations and/or communications regarding the San Tan expansion project with SRP, Town of Gilbert, Gilbert residents and EPG. In addition to the foregoing, my testimony will be based upon disclosure issues associated with the expansion of the San Tan plant, all the environmental impacts, damages and concerns for the health and welfare of my family, the community and property values.

Response 5. – As stated in number 4 above, my testimony will be based upon my participation in the San Tan Community Working Group, conversations and/or communications regarding the San Tan expansion project with SRP, Town of Gilbert, Gilbert residents and EPG. My testimony relating to disclosure issues will incorporate SRP's advertisement of the San Tan expansion plant. My testimony relating to the environmental impacts, lifestyle issues, damages and concerns for the health and welfare of my family, the community and property values will be based upon SRP's CEC Application, SRP's Open Houses for the San Tan expansion plant.

Response 6 - At this time, I have not decided upon any witnesses. I may call representatives of SRP and EPG relating to the San Tan Community Working Group and OPEN Houses for the San Tan expansion plant.

Response 7 – Again, my testimony before the line sitting committee will be based upon all response above. At this time, I have not retained an attorney for these proceedings.

Response 8 - The following represents the exhibits I plan to reply upon for my testimony:

1. All materials relating to the San Tan Community Working Group. These materials are not being provided, as SRP would be in possession of these materials.
2. All advertisement, publications, news articles, questionnaires relating or regarding the San Tan expansion plant. These materials are not being provided, as SRP would be in possession of these materials.
3. All materials provided by SRP at my request for a public document review on 8/29/00. These materials are not being provided, as SRP would be in possession of these materials.

4. All materials provided to me by the Town of Gilbert at my request for public document review on 8/30/00. These materials are not being provided as SRP could easily obtain these materials from the Town of Gilbert by submitting a public document review request. Intervenor is also informed that SRP may have most if not all of this information in their possession. To obtain a public document request Form please go to the Town of Gilbert's website @ www.ci.gilbert.az.us.
5. All planning and zoning codes, zoning maps, The Gilbert General Plan. All plans of development submitted by SRP relating or regarding the San Tan expansion plant. These materials are a matter of public record and can be obtained at the Town of Gilbert. Intervenor is also informed that SRP may have most if not all of this information in their possession. To obtain a public document request form please go to the Town of Gilbert's website @ www.ci.gilbert.az.us.


DATA REQUEST TO SRP

Intervenor, Cathy Lopez submits this data request to you and request that you provide complete answers to these questions and produce the documents and things requested. These responses should be delivered to Cathy Lopez within three days. This is a continuing request that you promptly supplement your responses in the event that additional information or documents become available.

Intervenor would also request those documents which have not been produced to date but which were previously requested from SRP over 28 days ago. Terry Lonon, Janeen Rohovit and Randy Dietrich would have all communications regarding prior document requests.

1. Please identify each and every witness you intent to present at the hearing.
2. For each witness that you intend to present at the hearing, please state the following:
 - a) The witness name and address
 - b) The witnesses qualifications as they pertain to the testimony.
 - c) A summary of the expected testimony of the witness.
 - d) The identification of any exhibits or reports which will be used or referenced in by the witness.
3. Please identify and produce each exhibit you intend to introduce at the hearing.

DATED: September 5, 2000.


Cathy D. Duplissa-Lopez, San Tan Community
Working Group and Resident of Gilbert, Arizona

Original and 25 copies filed
this 5th day of September, 2000
with:

Docket Control
Arizona Corporation Commission
1200 West Washington Street
Phoenix, Arizona 85007

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Copy of the foregoing mailed
This same date to:

Kenneth C. Sundlof, Esq.
JENNINGS, STROUSS & SALMON, PLC
One Renaissance Square
Two North Central Avenue
Phoenix, Arizona 85004-2393

By

A handwritten signature in cursive script, appearing to read "C. D. Ripstein-Ripstein", written over a horizontal line.

1 Kenneth C. Sundlof, Jr. - 004430
2 **JENNINGS, STROUSS & SALMON, P.L.C.**

3 A Professional Limited Liability Company
4 One Renaissance Square
5 Two North Central Ave.
6 Phoenix, AZ 85004-2393
7 Telephone: (602) 262-5911

8 Attorneys for Salt River Project

9 **BEFORE THE ARIZONA POWER PLANT AND TRANSMISSION**
10 **LINE SITING COMMITTEE**

11 IN THE MATTER OF THE
12 APPLICATION OF SALT RIVER
13 PROJECT, OR THEIR ASSIGNEE(S), IN
14 CONFORMANCE WITH THE
15 REQUIREMENTS OF THE ARIZONA
16 REVISED STATUTES 40-360.03 AND 40-
17 360.06 FOR A CERTIFICATE OF
18 ENVIRONMENTAL COMPATIBILITY
19 AUTHORIZING THE CONSTRUCTION
20 OF NATURAL GAS-FIRED, COMBINED
21 CYCLE GENERATING FACILITIES
22 AND ASSOCIATED INTRAPLANT
23 TRANSMISSION LINES, SWITCHYARD
24 IN GILBERT, ARIZONA LOCATED
25 NEAR AND SOUTHEAST OF THE
26 INTERSECTION OF VAL VISTA DRIVE
AND WARNER ROAD.

CASE NO. 105
DOCKET NO. L-00000B-00-0105

DATA REQUESTS TO INTERVENOR
CATHY LOPEZ

19 Applicant Salt River Project submits this data request to you and requests that you provide
20 complete answers to these questions and produce the documents and things requested.

21 These responses should be delivered to the undersigned counsel for SRP within three days.

22 This is a continuing request and we request that you promptly supplement your responses
23 in the event that additional information or documents become available.

- 24 1. Please state whether you represent a group or organization.
25 2. If the answer is yes, please identify the group or organization name and describe the
26 nature of the group or organization.

- 1 3. Please provide the names and addresses of each member of the group or
2 organization.
- 3 4. Please state each argument that you intend to raise at the hearing in opposition to
4 SRP's Santan Expansion Project.
- 5 5. For each argument identified in your answer to number four, describe the factual
6 basis for the argument.
- 7 6. For each witness that you intend to present at the hearing state:
8 a. The witness name and address
9 b. The witnesses qualifications as they pertain to the testimony
10 c. A summary of the expected testimony of the witness
11 d. The identification of any exhibits or reports which will be used or referenced
12 by the witness.
- 13 7. Please provide the name and address of the attorney or attorneys who will represent
14 you in these proceedings.
- 15 8. Please identify and produce each exhibit which you intend to introduce at the
16 hearing.

17 RESPECTFULLY SUBMITTED this 1st day of September, 2000.

18 JENNINGS, STROUSS & SALMON, P.L.C.

19
20
21 By: 

22 Kenneth C. Sundlof, Jr.
23 Two North Central Avenue
24 Sixteenth Floor
25 Phoenix, AZ 85004
26 Attorneys for Salt River Project